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June 20, 2025

MEMO ENDORSED
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VIA ECF

Hon. Richard M. Berman
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Burnham, et al., v. Compass Minerals International, Inc., et al.*, Case No. 1:25-cv-03892

Dear Judge Berman:

We write on behalf of Defendants Compass Minerals International, Inc. and Compass Minerals America Inc. (collectively, “Defendants”) in the above-captioned matter. Pursuant to Your Honor’s Individual Practices, we write to request an adjournment of the initial pretrial conference scheduled for June 24, 2025. This is Defendants’ first request for an adjournment of the initial pretrial conference. Because no scheduling order has been entered in the case, an adjournment of the initial pretrial conference will not affect any other scheduled dates in this matter.

Defendants request this adjournment for two reasons. First, on May 30, 2025, Defendants filed a letter with the Court in accordance with Rule 2.A of Your Honor’s Individual Practices requesting a pre-motion conference in connection with Defendants’ proposed motion to dismiss Counts II-IV in the Complaint. Because Defendants are intending to move to dismiss, they have not yet filed their answer. Proceeding with the Rule 16 conference and entering a case schedule would be inefficient as the resolution of the motion to dismiss and the filing of Defendants’ answer (containing their affirmative defenses and/or counterclaims against Plaintiffs) will set the scope of discoverable issues in this case.

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Second, as the Parties indicated to the Court in their joint letter on May 30, 2025, the Parties have heeded the Court's counsel and agreed to a third-party settlement conference. The mediation is scheduled to occur in person on August 1, 2025 in Dallas, Texas with principals present. It is Defendants' position that the Parties should devote their resources to making that conference as productive as possible in a good faith attempt to bring forward a global resolution of the matters pending in both SDNY and in EDCAL.

An adjournment of the Rule 16 conference until after the motion to dismiss is resolved, Defendants answer is filed, and, importantly, the August 1, 2025 mediation occurs is the most efficient path forward for this matter—both for the Parties and for the Court.

Prior to filing this letter, Defendants conferred with Plaintiffs' counsel regarding this request for an adjournment. Plaintiffs do not consent to an adjournment of the initial pretrial conference as they do not wish to put litigation on hold pending a potentially unsuccessful third-party resolution.

Respectfully submitted,

/s/ Rebecca R. McLaughlin

CC: Plaintiffs' counsel (*via ECF*)

The conference scheduled for June 24, 2025 is
adjourned to August 20, 2025 at 10:00 AM in
Courtroom 17B.

SO ORDERED:

Date: 6/20/2025

Richard M. Berman
Richard M. Berman, U.S.D.J.